



November 20, 2018

Ms. Marlene H. Dortch  
Secretary  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: CG Docket No. 03-123, *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, and CG Docket No. 13-24, *Misuse of Internet Protocol (IP) Captioned Telephone Service*

Dear Ms. Dortch:

The undersigned and Roger Fleming of Northfork Strategies met yesterday on behalf of IDT Telecom, Inc. ("IDT") with Michael Carowitz, Special Counsel to Chairman Pai; Arielle Roth, Wireline Legal Advisor to Commissioner O'Reilly, and Kagen Despain of that office; Travis Litman, Chief of Staff and Senior Legal Advisor to Commissioner Rosenworcel; and Robert Aldrich, Legal Advisor to the Bureau Chief, Consumer and Governmental Affairs Bureau.

We discussed the pleadings filed in the dockets captioned above and, in particular, IDT's analysis of the authority granted to the Commission under Section 225(b)(2) of the Communications Act ("the Act") with respect to intrastate telecommunications relay services for purposes of administering and enforcing Section 225. We observed that no jurisdictional separation of carrier property or expenses is required for the Commission to include intrastate revenues in the revenue base it uses to calculate the TRS contribution factor and thus such an expansion would require no Commission action under Sec. 410 of the Act. Finally, we urged the Commission to adopt the approach to expanding the TRS fund revenue base described in paragraph 106 of the Further Notice of Proposed Rulemaking ("FNPRM")<sup>1</sup> in the instant docket as

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<sup>1</sup> *Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 13-24, 03-123, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, FCC No. 18-79 (rel. June 8, 2018).



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an interim measure should the Commission decide to refer to a Federal-State Joint Board the issues raised by the TRS contribution option described in paragraph 107 of the FNPRM.

Sincerely,

A handwritten signature in cursive script that reads 'Colleen Boothby'.

Colleen Boothby  
Counsel, IDT Telecom, Inc.

cc: Michael Carowitz  
Arielle Roth  
Kagen Despain  
Travis Litman  
Robert Aldrich